

EXHIBIT 23

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
PLAINTIFF ALYAS; PLAINTIFF MARCOS;
PLAINTIFF AHMED; PLAINTIFF RACHEL;
PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and LUTHERAN
COMMUNITY SERVICES NORTHWEST,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; MARCO RUBIO,
in his official capacity as Secretary of State;
KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; DOROTHY A.
FINK, in her official capacity as Acting Secretary
of Health and Human Services,

Defendants.

Case No. C25-255 JNW

**DECLARATION OF RICHARD L.
SANTOS**

I, Richard L. Santos, hereby declare:

1. I am President and Chief Executive Officer of Church World Service (CWS), one of ten national resettlement agencies. The facts set forth in this declaration are based on my personal knowledge, on my conversations with my staff, and on the information kept in the ordinary course of business at CWS.

DECL. OF RICHARD L. SANTOS
(No. C25-255 JNW)

Perkins Coie LLP
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1 2. I make this declaration in support of Plaintiffs' Motion for a Preliminary Injunction,
2 because the suspension of the U.S. Refugee Assistance Program (USRAP) and the suspension of
3 government funding for USRAP and to support recently-arrived refugees and Special Immigrant
4 Visa holders represent an existential threat to CWS's mission and funding.

5 3. The government's suspensions have already caused immense and irreparable harm
6 to CWS's work with refugees, which has been paused indefinitely; to our clients and their families,
7 whose hopes for safety, resettlement and family reunification have been thwarted; and to our staff,
8 hundreds of whom have already been furloughed or laid off.

9 **I. Church World Service**

10 4. Church World Service (CWS) is a 501(c)(3) non-profit, faith-based global
11 humanitarian organization founded in 1946 by 17 religious denominations seeking to respond to
12 the humanitarian and displacement crisis created by World War II, with the mission to "Feed the
13 hungry, clothe the naked, heal the sick, comfort the aged, shelter the homeless."

14 5. Today, CWS continues to be a faith-based organization transforming communities
15 around the globe through just and sustainable responses to hunger, poverty, displacement, and
16 disaster.

17 6. Since its founding, CWS has helped refugee families rebuild their lives through
18 resettlement to the United States, beginning with CWS representatives meeting refugees arriving
19 on ships from war-torn Europe and providing for their passage to local communities and churches
20 ready to welcome them throughout the United States.

21 7. CWS has offices in sixteen countries, including the United States. Our headquarters
22 and principal place of business is in New York City, and we have offices in Elkhart, Indiana and
23 Washington, D.C., and across the country. CWS works closely with its 14 Covenant Members who
24 represent a new way for historical members of CWS to engage with each other and the
25 organization. Our Covenant Members work together with CWS to find practical ways to engage
26 their faith communities in carrying out our common mission of providing refuge to those fleeing

1 violence and persecution and they represent more than 9 million members across the United States
2 and Canada.

3 8. As CWS's work has expanded to include development, humanitarian assistance,
4 and advocacy for refugees worldwide, U.S. refugee resettlement remains at the heart of our
5 mission.

6 9. Either directly or through its affiliates, CWS currently supports refugees resettled
7 in 44 active locations in 24 states: California, Connecticut, Delaware, Florida, Georgia, Illinois,
8 Indiana, Iowa, Kentucky, Massachusetts, Michigan, Nebraska, New Hampshire, New Jersey, New
9 York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Texas, Utah,
10 Virginia. CWS additionally is currently serving recently arrived refugees in Anchorage, Honolulu,
11 Providence, and Provo through Remote Placement partners, and maintains capacity to recruit and
12 manage Remote Placement partners in areas outside of its resettlement office locations.

13 10. CWS's offices in Dallas, TX, Durham, NC, Garden Grove, CA, Georgetown, DE,
14 Grand Rapids, MI, Greensboro, NC, Harrisburg, PA, Harrisonburg, VA, Houston, TX, Islip, NY,
15 Jacksonville, FL, Jersey City, NJ, Kalamazoo, MI, Lancaster, PA, Miami, FL, Orlando, FL,
16 Rochester, NY, Tampa, FL, Walnut Creek, CA, Wilmington, NC, and Winchester, VA are part of
17 CWS's 501(c)(3) structure and provide Reception and Placement (R&P) services. CWS operates
18 the remaining offices through sub-grant agreements with affiliates.

19 11. To carry out our work effectively, our local resettlement offices work hard to
20 employ and retain staff with special skills, including language skills and ties to refugee
21 communities. Many of our staff are themselves immigrants and former refugees. Combined, our
22 local resettlement offices typically employ over 1000 individuals.

23 12. Our local resettlement offices' ability to resettle refugees successfully in the United
24 States requires that cultivation and maintenance of local community relationships and programs.
25 For example, given that we are required to secure housing for refugees before they arrive in the
26 United States, our local offices coordinate leases with landlords on behalf of people the landlord

1 has never met and who have no credit, employment, or renting history in the United States.
2 Landlords agree to sign these leases with our clients only because of our local resettlement offices'
3 reputations in the community and the strong relationships with landlords that our local offices have
4 developed and positive experiences renting to refugees in the past.

5 13. Similarly, in order to assist refugees in obtaining employment, our local staff
6 engage in extensive outreach with local employers to persuade them to consider hiring refugees
7 who may not speak any English, come from a very different cultural background, and have never
8 worked in the United States. Staff also engage in substantial outreach with local school systems,
9 local health care providers, local law enforcement, and local benefit offices.

10 14. CWS also depends heavily on the generosity and work of volunteers in the counties
11 where we resettle refugees (200 counties in federal fiscal year 2024). These volunteers come
12 through our church constituency and a variety of other constituencies, and the investments we have
13 made over time in relationships with a wide range of community members, including local
14 landlords, medical providers, and employers. CWS practices a co-sponsorship model of refugee
15 resettlement, serving as a conduit to local faith communities who believe—as CWS and our
16 covenant members do—that refugee resettlement is a fulfillment of their Biblical calling to
17 welcome the stranger and their churches' organizational missions.

18 15. I have been the President and CEO of CWS since 2020 and have spent more than
19 three decades working in the relief, development and displacement sectors. I previously served as
20 the President and CEO of IMA World Health, a faith-based public health organization. Throughout
21 my career, I have focused on engaging and partnering with civil society in the development process
22 to build and prioritize robust local and regional partnerships with communities, organizations, and
23 networks throughout the United States and across the globe.

24 **II. CWS's Participation in the U.S. Refugee Admissions Program**

25 16. CWS operates programs related to the U.S. Refugee Admissions Program
26 (USRAP) both within the United States and in Africa. Within the United States, CWS works to

1 build welcoming communities that support refugees on a path toward self-sufficiency, full
2 integration into their communities, and securing a bright future for their families.

3 17. CWS is one of ten resettlement agencies that for decades have been entrusted with
4 the responsibility to manage the reception and placement of refugees in the United States under
5 the Refugee Act. CWS itself has participated in the U.S. State Department's Reception and
6 Placement program since it began in 1980 and has operated its Resettlement Support Center (RSC
7 Africa) since 1989.

8 18. Since its founding, CWS has helped to resettle more than 910,000 refugees,
9 humanitarian parolees, and other entrants across the United States.

10 19. CWS receives funding from the U.S. Department of State through seven
11 "cooperative agreements" with the Bureau of Population, Resettlement and Migration (PRM). The
12 FY25 combined PRM cooperative agreements provide for \$100,646,762. Of these, five relate to
13 the USRAP and total \$98,128,461, approximately 35% of CWS's annual revenue. The five
14 cooperative agreements each have an end date of September 30, 2025.

15 20. Two of the USRAP-related cooperative agreements with PRM are for services
16 provided through the Reception and Placement Program, and two are for services provided through
17 the Refugee Housing Solutions (RHS) and Refugee Welcome Collective (RWC) technical
18 assistance projects, which support the work of housing attainment and community sponsorship for
19 refugees resettled by all ten resettlement agencies. These agreements are all for work performed
20 in the United States to assist refugees and SIVs who have recently resettled.

21 21. Through the Reception & Placement (R&P) Program, CWS provides services to
22 resettled refugees during their first 30 to 90 days in the United States. These services include
23 activities such as pre-arrival settlement planning, including arranging for the refugee to be met at
24 the airport; basic needs support, including housing, furnishings, food and clothing for at least 30
25 days; cultural orientation assistance; access to health, employment, education and other services
26 for which refugees are eligible, and development of a service plan for each adult refugee.

22. Through the R&P program, in federal Fiscal Year 2024, which ran from October 1, 2023, to September 30, 2024, we resettled 15,061 refugees, and Special Immigrant Visa (SIV) holders in 200 different countries in the United States. We provided 9,637 individuals with these services in Fiscal Year 2023 and 12,471 individuals with these services in Fiscal Year 2022, including refugees, SIV holders, and Afghan Placement and Assistance Program (APA) beneficiaries.

23. The remaining USRAP-related cooperative agreement with PRM is for CWS's work in administering the Resettlement Support Center (RSC Africa) program, located primarily in Nairobi, Kenya, with additional offices in South Africa, Tanzania, Uganda, and Rwanda.

24. RSC staff pre-screen applicants for eligibility for applicable priorities and prepare cases for processing through U.S. Citizenship and Immigration Services, a component of the Department of Homeland Security. RSC staff assist applicants in completing documentary requirements and schedule refugee eligibility interviews. After USCIS conducts security vetting on applicants, RSC staff guide refugees through post-adjudication steps, including medical screening, cultural orientation, domestic sponsorship assurances, and referrals to the International Office of Migration for travel planning. In FY24, CWS' RSC Africa program departed 31,416 individuals to the United States from sub-Saharan Africa.

25. Each of the five PRM cooperative agreements include a document entitled "U.S. Department of State Award Provisions," which states in part that "[d]uring the period of performance, the Recipient must comply with . . . [t]he applicable sections of 2 CFR §200 and 2 CFR §600[.]"

III. Executive Order 14163 and Immediate and Ongoing Impact on CWS and its Clients

26. On January 20, 2025, President Trump signed an Executive Order ("EO") suspending all refugee admissions and decisions effective January 27, 2025. EO 14163, titled "Realigning the United States Refugee Admissions Program," orders the suspension of all refugee admissions and decisions on refugee applications "until such time as the further entry into the

1 United States of refugees aligns with the interests of the United States interests,” that is to say,
2 indefinitely.

3 27. EO 14163 has caused immediate harm to CWS’s mission and to its economic
4 stability, and that harm increases with every day that the EO remains in effect.

5 28. Although EO provides for a “case-by-case” waiver for refugees whose entry is
6 deemed to be in the “national interest,” there has been no information forthcoming from the State
7 Department about what such a process would entail. Thus EO 14163 places almost insurmountable
8 obstacles for any refugee to enter the United States and thus makes it extremely difficult for CWS’s
9 refugee assistance programs to fulfill their mission to help refugees enter the United States through
10 the statutory pathways authorized by the United States Congress.

11 29. The day after the EO was issued, on January 21, 2025, CWS received an email from
12 PRM addressed to numerous USRAP partners stating that:

13 Following the issuance of the Executive Order (EO), “Realigning the United States
14 Refugee Admissions Program,” refugee arrivals to the United States have been
15 suspended until further notice. All previously scheduled travel of refugees to the
United States is being cancelled, and no new travel bookings will be made. RSCs
should not request travel for any additional refugee cases at this time.

16 Additionally, all refugee case processing and pre-departure activities are also
17 suspended. RSCs and IOM should not move refugees to transit centers in
18 anticipation of travel and should halt all pre-departure activities for refugee cases.
19 No new referrals should be made into the USRAP. Intake of new applications for
the Welcome Corps is suspended, as well as processing of all active or previously
submitted applications. We understand there will be questions related to the
implementation of suspending refugee case processing, and we will send additional
guidance in the coming days.

20 30. In a follow-up email, PRM confirmed “that all planned refugee arrivals for this
21 week have been cancelled and we do not anticipate any being scheduled,” notwithstanding the
22 EO’s admissions suspension not being effective until January 27, 2027.

23 31. As a result of the EO, thousands of our clients in the refugee pipeline fear they will
24 never be able to enter the United States, see long-separated family members, or achieve safety and
25 stability from danger.
26

1 32. As of February 7, 2025, CWS has 5,277 clients overseas who have been extensively
2 vetted and have valid assurances to enter the United States.

3 33. 42 of these clients are “Follow-to-Join” spouses and children of refugees currently
4 resettled in the United States. These family members have been separated for months and even
5 years from their petitioning relative.

6 34. Of these overseas clients, 127 had petitions filed on their behalf by an immediate
7 relative in statutorily-created categories.

8 35. Another 766 of these clients are approved under the Special Immigrant Visa (SIV)
9 program, 764 of whom are people who worked for the United States government or its contractors
10 in Iraq and Afghanistan.

11 36. The plans of all of these clients have been completely reversed.

12 37. Some of our clients were so far along in the process that they had travel already
13 scheduled when EO 14163 was signed. That travel has been cancelled. For example, CWS’s
14 affiliate in Buffalo, New York was expecting a “Follow-to-Join” Somali minor to reunite with her
15 father on February 11, 2025. Shortly after the EO was signed, CWS was informed that her travel
16 was cancelled. She has been waiting to reunite with her father since before April 2017.

17 38. Indeed, although EO 14163 purported to take effect on January 27, 2025, in fact
18 several of the refugees assured to CWS were unable to enter the United States. For example,
19 CWS’s affiliate in Worcester, Massachusetts affiliate was supposed to receive four unaccompanied
20 Afghan minors, ages 7, 14, 15 and 17, who were expecting to reunite with their parents on January
21 23, 2025. On January 22, CWS received a travel cancellation for the four minors with the
22 cancellation reason listed as “due to executive order on realigning USRAP.” These minor children
23 had been separated from their parents on August 21, 2021, outside Kabul airport.

24 39. Further, although EO 14163 did not explicitly address the processing of refugee
25 applications, in fact the State Department has ceased accepting applications from refugees through
26 USRAP.

40. Because the suspension is indefinite, we are unable to predict when or if services will resume. It will be exceedingly difficult to maintain relationships with sponsors of refugees and our extensive local networks while the programs are indefinitely suspended. Our mission to serve refugees will be irreparably damaged.

41. The suspension of admission of refugees is also devastating economically to CWS's refugee programs, which depend on federal funding as part of the public-private partnership that is the foundation of the USRAP. We have already begun furloughing and laying off hundreds of staff, with the resulting loss of institutional knowledge and experience and personal relationships.

IV. EO 14169 and the U.S. State Department's January 24, 2025 Notice of Suspension to CWS to "Stop Work" on Seven Grants.

42. In addition to EO 14163, on January 20, President Trump signed 44 other executive orders. Among these were EO 14169, "Reevaluating and Realigning Foreign Aid," which suspended all foreign aid programs, including those related to the USRAP, for ninety days.

43. On January 24, 2025, CWS received a Notice of Suspension letter from the U.S. State Department's Bureau of Population, Refugees, and Migration (PRM) stating that seven (7) different grants to CWS were immediately suspended "pending a Department-wide review of foreign assistance programs" pursuant to EO 14169. See January 24, 2025 Letter attached to this declaration (hereinafter "CWS Suspension Notice").

44. Also on January 24, CWS received a cable from Secretary of State Marco Rubio to all diplomatic and consular posts (ALDAC) informing them of the funding suspension pursuant to EO 14169.

45. On February 3, CWS received an email from PRM addressed to numerous USRAP partners stating that:

PRM is complying with the Executive Order (EO) Reevaluating and Realigning United States Foreign Aid which directs a 90-day pause in assistance including new obligations and disbursements to both non-governmental organizations (NGOs) and international organizations. While final guidance on processing payments is

not yet available, PRM believes that payments will be allowed for requests meeting the following conditions:

- Payments are for expenses incurred prior to January 24, 2025
- Payments are for expenses associated with stop work orders
- Payments are for emergency food assistance
- Payments are for exempted activities

In order to move payments forward, PRM will need recipients to certify payment requests meet one of these conditions. For payments already in process, grants officers will reach out with a certification form. For any future payments, please use the attached form to certify that payments meet one (or more) of these criteria. Please submit the form as a .pdf and have it signed by the appropriate authorized official for your organization.

Please note, the guidance is not yet available and this process may change. PRM is working hard to adjudicate payments and disburse funding. We appreciate your patience and understanding as we ensure compliance with EOs. PRM will share additional information and/or requirements as they become available.

Please abide by the notice of suspension issued to your organization. Recipients are reminded that any changes to award terms and conditions, as well as costs, must be approved by a grants officer. The program officer does not have authority to approve award costs or program changes.

46. After receiving the February 3 email, CWS on February 6 submitted the certification forms and documentation for reimbursements. CWS has yet to receive any reimbursements for this work.

47. Since the issuance of the Executive Orders, CWS has not received any reimbursement from PRM, including for program costs and expenses incurred prior to January 20, 2025. We have also received no guidance or direction regarding how to balance compliance with the CWS Suspension Notice and our Cooperative Agreement requirements to serve refugees in our care.

V. Immediate Impact on Refugees Served by CWS

48. The financial impact on recently resettled refugees in the United States is severe.

49. Through the Reception and Placement Program, as specified in the annual cooperative agreement, the federal government provides CWS with funding for national management of the R&P program, as well as fixed per capita grants of \$3,000 per refugee admitted

1 under Section 207 of the INA who is assigned to CWS pursuant to the agreement. No more than
2 \$1,350 of that grant may be used to partially cover affiliate capacity expenses of the local office
3 to which refugees are assigned for providing resettlement services, while at least \$1,650 must be
4 used to cover direct assistance payments directly to or on behalf of the individual refugee or other
5 refugees. Affiliate capacity funding is based on the number of refugees assigned to the affiliate
6 during the grant period. The government reimburses CWS for direct assistance costs based on the
7 number of refugees for whom CWS provides Reception and Placement services. If fewer refugees
8 receive CWS' Reception and Placement services, federal reimbursements are reduced.

9 50. A large portion of these funds for refugees CWS has resettled since October 1, 2024
10 have been effectively frozen.

11 51. Since the beginning of federal Fiscal Year 2025 on October 1, 2024, the CWS
12 network has served 9,534 refugees and SIV holders arrived through its R&P program. As of
13 February 7, 2025, 3,718 recently arrived refugees and SIV holders are still within their first 90-
14 day service period following their resettlement in the United States.

15 52. The impact of this CWS Suspension Notice was immediately destabilizing to
16 CWS's operations. Our R&P, RSC, RHS, RWC, and two additional PRM Assistance grants in
17 Egypt and Indonesia, totaling \$100,646,762, stopped with no warning or chance for us to prepare.

18 53. As of February 7, 2025, we have not been paid \$15,085,770.80 that we have
19 submitted for reimbursement for expenses incurred prior to the CWS Suspension Notice.

20 54. The impact has been crushing at the national and international levels. Exclusive of
21 our affiliates, CWS employed over 1,000 individuals in the United States as of January 31, 2025.
22 We furloughed 852 of them as of February 6, 2025, and, pursuant to the requirements of the
23 Worker Adjustment and Retraining Notification (WARN) Act, issued letters to many of the
24 furloughed employees, putting them on notice that these furloughs may become layoffs. In
25 addition, we have initiated layoffs of over 600 staff in Africa.
26

55. This is likely just the start of a process of debilitating shrinking of our work in the United States and around the world.

VI. Conclusion

56. EO 14163 and its implementation pose existential threats to CWS's decades-long commitment to refugee resettlement and to the well-being of refugees and others needing humanitarian protection in the United States. Every day that a refugee has to wait longer for safety, stability, and family connection causes an immeasurable and irreparable loss. Every day of furlough and layoff of our staff adds to the harm suffered by CWS, the communities we serve, and the faith communities with whom we partner. Without immediate relief, once we lose our staff and partners, whose expertise, local knowledge, and networks are essential for the success of our programs, it will be difficult and costly, if not impossible, to rebuild.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed in Silver Springs, Maryland on February 11, 2025.

Signed by:

328D1D2DC064462...
Richard L. Santos

Attachment A
(to Declaration of Richard L. Santos)



United States Department of State
Bureau of Population, Refugees, and Migration
Washington, D.C. 20520

January 24, 2025

REDACTED

Church World Service
475 Riverside Dr., Suite 700
New York, NY 10115

REF: SPRMCO24CA0095
SPRMCO24CA0254
SPRMCO24CA0329
SPRMCO24CA0308
SPRMCO24CA0337
SPRMCO24CA0319
SPRMCO24CA0322

Consistent with the President's Executive Order on Reevaluating and Realigning United States Foreign Aid, the U.S. Department of State, Bureau of Population, Refugees, and Migration hereby notifies the recipient that, consistent with the terms of the award(s), the referenced award(s) are immediately suspended as of January 24, 2025. Award(s) may no longer effectuate agency priorities and are suspended pending a Department-wide review of foreign assistance programs. Decisions whether to continue, modify, or terminate award(s) will be made following this review.

Effective immediately upon receipt of this Notice of Suspension the Recipient must stop all work under the award(s) and not incur any new costs after the effective date cited above. The Recipient must cancel as many outstanding obligations as possible.

To comply with the Executive Orders on Ending Radical and Wasteful Government DEI Programs and Preferencing and Initial Recissions of Harmful Executive Orders and Actions, Recipients are hereby notified that no U.S. Government funds may be used to promote "diversity, equity, and inclusion" (DEI) at any level or in any activity, regardless of partner or program location. Any use of PRM funding to promote DEI must cease immediately, including activities that were previously authorized by PRM. Your certification that all such activities funded by U.S. Government funds have ceased is required immediately by emailing the grants officer for your award and copy PRM-Comp-Mgt@State.gov. We understand that you may be receiving multiple emails from various grantors requesting this certification. Recipients must reply to this letter by email.

Recipients may submit payment requests for legitimate expenses incurred prior to the date of this Notice of Suspension or legitimate expenses associated with this Notice of Suspension.

Recipients are reminded that any changes to award terms and conditions, as well as costs must be approved by a grants officer. The program officer does not have authority to approve award costs or program changes.

If you have any other questions regarding the suspension, please contact me at REDACTED@state.gov.

Sincerely,

REDACTED

